

WAYNE RESPER # 274319,

IN THE

PLAINTIFF

RECEIVED
CIRCUIT COURT
ALLEGANY CO.

JUL 1 1984 - 2 AM: 01

CIRCUIT COURT

FOR

1. CARIZON HEALTH, INC.

C/O THE CORPORATION

TRUST, INC.

2405 YORK ROAD, SUITE 201

LUTHERVILLE, MD 21093-2264

2. HOLLY L. GROVER, RD

14100 MCMULLEN HWY., S.W.

CUMBERLAND, MD 21502

13800 MCMULLEN HWY., S.W.
CUMBERLAND, MD 21502

ALLEGANY COUNTY

CASE NO.: CO1CUA1274

3. WILLIAM "BILL" BEELAN, RN

14100 MCMULLEN HWY., S.W.

CUMBERLAND, MD 21502

13800 MCMULLEN HWY., S.W.
CUMBERLAND, MD 21502

4. SUEAD K. PRYAR, RN

14100 MCMULLEN HWY., S.W.

CUMBERLAND, MD 21502

13800 MCMULLEN HWY., S.W.
CUMBERLAND, MD 21502

5. BRITTANY HAMLET, RN

14100 MCMULLEN HWY., S.W.

CUMBERLAND, MD 21502

13800 MCMULLEN HWY., S.W.
CUMBERLAND, MD 21502

6. WILLIAM "BO" RAYOR, RN

14100 MCMULLEN HWY., S.W.

CUMBERLAND, MD 21502

13800 MCMULLEN HWY., S.W.
CUMBERLAND, MD 21502

7. JAN ROBINSON, RN
14100 MCMULLEN HWY., S.W.
CUMBERLAND, MD 21502

13800 MCMULLEN HWY., S.W.
CUMBERLAND, MD 21502

8. AMY BERKEBILE, RN
14100 MCMULLEN HWY., S.W.
CUMBERLAND, MD 21502

13800 MCMULLEN HWY., S.W.
CUMBERLAND, MD 21502,

DEFENDANTS

COMPLAINT

I. JURISDICTION AND VENUE

1. THIS IS A CIVIL ACTION AUTHORIZED BY THE CONSTITUTION OF MARYLAND, THE MARYLAND TORT CLAIMS ACT (MTCA) AND THE MARYLAND MALPRACTICE ACT (MMA) TO REDRESS THE DEPRIVATION OF RIGHTS SECURED BY THE CONSTITUTION OF MARYLAND.

2. THE CIRCUIT COURT FOR ALLEGHENY COUNTY IS THE APPROPRIATE VENUE BECAUSE IT IS WHERE THE EVENTS GIVING RISE TO THIS CLAIM OCCURRED.

II. PLAINTIFF

3. PLAINTIFF, WAYNE RESPER #274319, IS AND WAS AT ALL TIMES MENTIONED HEREIN A PRISONER OF THE STATE OF MARYLAND IN THE CUSTODY OF THE MARYLAND DIVISION OF CORRECTIONAL (DOC). PLAINTIFF IS CURRENTLY CONFINED AT NORTH BRANCH CORRECTIONAL INSTITUTION (NBI) IN CUMBERLAND, MARYLAND.

III. DEFENDANTS

4. DEFENDANT, CORIZON HEALTH IS THE CONTRACTED HEALTH PROVIDER FOR THE STATE OF MARYLAND AND EMPLOYER OF NANCY HOOVER, RN WILLIAM BEEMAN, RN BETTYN HAMLET, RN SUSAN K. PRYOR, RN WILLIAM RAYNOR, RN JAN ROBINSON AND RN AMY BERKEBILE.

5. EACH DEFENDANT IS SUED INDIVIDUALLY AND IN HIS/HER OFFICIAL CAPACITY. AT ALL TIMES MENTIONED IN THIS COMPLAINT, EACH DEFENDANT ACTED UNDER THE COLOR OF STATE LAW.

IV. FACTS

6. ON MONDAY, AUGUST 24, 2020, PLAINTIFF WAS TRANSFERRED TO NPI, ALONG WITH PLAINTIFF'S PERSONAL PROPERTY, PRESCRIBED MEDICATIONS AND PRESCRIBED MEDICAL DEVICES.

7. DESPITE NUMEROUS WRITTEN AND VERBAL REQUESTS TO NP HOOVER AND THE MEDICAL DEPARTMENT, PLAINTIFF'S PRESCRIBED MEDICATIONS AND DEVICES WERE NEVER RETURNED, CAUSING PLAINTIFF TO SUFFER TREMENDOUS PAIN AND SUFFERING, ALONG WITH SEVERELY EXACERBATED INJURIES RELATED TO CHRONIC CONDITIONS, THEREBY TERMINATING PRESCRIBED MEDICAL CARE.

NP HOOVER FAILED TO CONDUCT AN EXAMINATION OR EVALUATION OF PLAINTIFF OR DIRECT THE SAME, LEAVING PLAINTIFF'S CHRONIC CONDITIONS UNTREATED.

NP HOOVER FAILED TO PROPERLY AND ACCURATELY DOCUMENT PLAINTIFF'S CHRONIC MEDICAL CONDITIONS, SUBSEQUENTLY FAILING TO PRESENT PLAINTIFF TO QUALIFIED MEDICAL PERSONNEL. NP HOOVER UNANIMOUSLY ENDANGERED PLAINTIFF BY FAILING TO RECOGNIZE PLAINTIFF'S OBVIOUS NEED FOR MEDICAL CARE WHILE

CONDUCTING HERSELF IN A CRUEL AND UNUSUAL MANNER INFILTRATE TORTURE UPON PLAINTIFF KNOWLEDGELY AND MALICIOUSLY. NP HOOVER'S BLAUGHT AND MALICIOUS CONDUCT WAS AND REMAINS UNBECOMING OF A MEDICAL PROFESSIONAL.

THE WACZ MEDICAL DEPARTMENT AND NP HOOVER UNREASONABLY DELAYED AND FAILED TO PROVIDE MEDICAL CARE FOR PLAINTIFF, BLEEDING LUMPS AND BROTHES IN PLAINTIFF'S GROIN AREA AND FRONT AND BACK OF PLAINTIFF'S THIGH, EXPOSING PLAINTIFF TO SIGNIFICANT PAIN, SUFFERING AND BLEEDING FOR MORE THAN EIGHT MONTHS.

ACTING IN AN ADVISORY CAPACITY WITHOUT EXAMINING PLAINTIFF OR DIRECTING THE SAME, NP HOOVER REFUSED PLAINTIFF ANY MEASURE OF MEDICAL CARE UNDER THE PREMISE THAT PLAINTIFF COULD PURCHASE MEDICAL PRODUCTS FROM THE COMMISSARY. THOUGH SHE COULD HAVE, NP HOLLY REFUSED AND FAILED TO PROVIDE PLAINTIFF MEDICAL CARE.

8. DESPITE NUMEROUS VERBAL REQUESTS TO RN HAMILT, PLAINTIFF WAS IGNORED AND DISREGARDED AS RN HAMILT FAILED TO REPORT PLAINTIFF'S MEDICAL CONCERN, FAILED TO PROPERLY PRONOS PLAINTIFF'S MEDICATIONS AND FAILED TO PROVIDE PLAINTIFF MEDICAL CARE WHILE SUGGESTING THAT THE MEDICAL PROCESS WAS "NOT A DEMOCRACY."

NP HAMILT'S CONDUCT WAS AND REMAINS UNBECOMING OF A MEDICAL PROFESSIONAL BY ENDANGERING PLAINTIFF WHILE ACQUISITIVE TO THE INFILCTION OF TORTURE UPON PLAINTIFF.

9. DESPITE THE OBVIOUS NEED FOR MEDICAL CARE AND NUMEROUS REQUESTS TO THE MEDICAL DEPARTMENT, RN BREEMAN REFUSED AND FAILED TO OFFER ANY MEASURE OF ASSISTANCE TO PLAINTIFF IN THE ACQUISITION OF MEDICAL CARE FOR CHRONIC CONDITIONS EXACERBATED BY NEGLIGENCE FOR MONTHS. RN BREEMAN ALSO FAILED TO CONDUCT AD

EXAMINATION OF PLAINTIFF OR DIRECT THE SAME TO PROVIDE MEDICAL CARE FOR THE CONDITIONS COMPLAINED OF. RN BEEMAN ALSO FAILED TO REFER PLAINTIFF TO QUALIFIED MEDICAL PERSONNEL FOR TREATMENT, CAUSE AND INFECTIVE TORMIRE UPON PLAINTIFF THROUGH SILENCE. RN BEEMAN'S CONDUCT WAS AND REMAINS UNBECOMING OF A MEDICAL PROFESSIONAL.

10. DESPITE THE OBVIOUS NEED FOR REFERRAL TO ADVANCED CARE, RN PRYOR FAILED TO PROPERLY AND ACCURATELY DOCUMENT PLAINTIFF'S WORSENING CONDITION, THEREBY EXPOSING PLAINTIFF TO EXTENDED PERIODS OF UNMANAGED PAIN AND SUFFERING THROUGH INADEQUATE MEDICAL CARE. RN PRYOR REFUSED AND FAILED TO PROVIDE DRESSING CHANGES FOR PLAINTIFF'S RIGHT LEG, CLAIMING NO ORDER EXISTED FOR CARE. RN PRYOR'S FAILURE TO DOCUMENT AND REPORT THE NEED FOR MEDICAL CARE TO HER RIGHT LEG SUBJECTED ME TO UNNECESSARY PAIN AND SUFFERING, ALONG WITH PREVENTABLE DETERIORATIVE CONDITIONS. RN PRYOR'S CONDUCT WAS AND REMAINS UNBECOMING OF A MEDICAL PROFESSIONAL.

DESPITE THE OBVIOUS NEED TO KEEP PLAINTIFF'S DRESSINGS DRY WHEN SHOWERING, RN PRYOR FAILED TO PROVIDE PLAINTIFF WITH PLASTIC BAGS AND TAPE AS NOTED IN PLAINTIFF'S MEDICAL RECORDS, THEREBY DEPRIVING PLAINTIFF OPPORTUNITIES TO SHOWER. RN PRYOR ALSO FAILED TO PRESENT SHD NEEDS TO PROPER MEDICAL PERSONNEL FOR ADDRESSING, THOUGH RN PRYOR KNEW THE NEED EXISTED.

11. DESPITE NUMEROUS VERBAL REQUESTS TO RN RAYNDR DURING DRESSING CHANGES, PLAINTIFF WAS IGNORED AND DISREGARDED BY RN RAYNDR'S FAILURE TO EVALUATE AND ACCURATELY DOCUMENT PLAINTIFF'S CHRONIC CONDITION THROUGH RN RAYNDR HAD FIRST HAND KNOWLEDGE OF PLAINTIFF'S CHRONIC CONDITION. RN RAYNDR FAILED TO

REPORT PLAINTIFF'S CHRONIC SWELLING AND BLISTERING WILERS ON PLAINTIFF'S RIGHT LEG AND FOOT FOR REFERRAL TO QUALIFIED MEDICAL PERSONNEL FOR TREATMENT. RN RAYNOR FAILED TO PROVIDE PLAINTIFF WITH PRESCRIBED SUPPLIES FOR CARE AND PROTECTION OF PLAINTIFF'S DRESSED LEFT LEG FOR SHOWERING AND DREN-
AGING RIGHT LEG AND FOOT FOR A DRESSING AND SHOWER PROTECTION, SUGGESTING "HOLLY" AS THE OBSTACLE.

THROUGH TACIT APPROVAL OF PLAINTIFF'S MEDICAL MISTREATMENT, RN RAYNOR ENDANGERED PLAINTIFF, ACTED IN A CRUEL AND UNUSUAL MANNER UNBECOMING OF A MEDICAL PROFESSIONAL WHILE INDUCE-
INGLY AND MALEICIOUSLY REVERSCENT TO THE SADISTIC ILLUSION OF TORTUREOUS PAIN AND SUFFERING UPON PLAINTIFF.

12. THROUGH NUMEROUS SICK-CALL REQUESTS, RN JAN ROBINSON WAS APPRISED OF PLAINTIFF'S CHRONIC CONDITIONS BUT FAILED TO REFER PLAINTIFF TO QUALIFIED MEDICAL PERSONNEL FOR TREATMENT WHILE FAILING TO CARRY OUT AN EXAMINATION OF PLAINTIFF TO DETERMINE THE BASIS FOR PLAINTIFF'S SICK-CALL REQUESTS THAT WERE ROUTINELY DIS-
REGARDED. RN ROBINSON'S INACTION AND TACIT APPROVAL OF PLAINTIFF'S MEDICAL MISTREATMENT EXPOSED PLAINTIFF TO PROLONGED PERIODS OF PAIN AND SUFFERING THAT COULD HAVE BEEN PREVENTED IF RN ROBINSON HAD ACTED BEYOND SILENCE. RN ROBINSON'S CONDUCT WAS AND REMAINS UNBECOMING OF A MEDICAL PROFESSIONAL.

13. DURING THE COURSE OF A SICK-CALL ENCOUNTER WITH BN AMY BERKELEY ON AUGUST 26, 2021, PLAINTIFF AGED SHOULD HAVE TOLD THE BASIS FOR PLAINTIFF'S MANY REQUESTS TO BE PRESENTED TO A PHARMACY AND TO HAVE VITAMIN E LOTION AND OTHER MEDICATIONS REFILLED.
AFTER CONVEYING, "BUY YOUR OWN FULLING LOTION FROM COMMISSARY,"

RN AMY WAS ASKED IF SHE WAS GOING TO REFER PLAINTIFF TO A PHYSICIAN FOR TREATMENT. AFTER BEING ADVISED THAT RN AMY WOULD NOT REFER PLAINTIFF TO A PHYSICIAN AND WOULD NOT TREAT PLAINTIFF FOR THE CONDITIONS PRESENTED, PLAINTIFF LEFT THE ROOM.

THOUGH RN AMY WAS FAMILIAR WITH PLAINTIFF'S SERIOUS CHRONIC CONDITIONS, RN AMY FAILED TO PROVIDE PLAINTIFF ANY MEASURE OF MEDICAL CARE TO RELIEVE THE CONDITIONS PRESENTED, EXPOSING PLAINTIFF UNNECESSARILY TO PROLONGED PERIODS OF PAIN AND SUFFERING THAT SHE MALICIOUSLY REFUSED TO TREAT OR REFER FOR TREATMENT. RN AMY'S VILE APPROACH TO MEDICAL CARE IS UNFIT AND RESEMBLES UNBECOMING OF A MEDICAL PROFESSIONAL.

14. DEFENDANTS NP HOOVER AND RN BEEMAN BLATANTLY LIED ABOUT PLAINTIFF'S NEED FOR A WHEELCHAIR, CAUSING PLAINTIFF TO MISS MORE THAN TWENTY MEDICAL APPOINTMENTS THAT INCLUDED SEVERAL WITH A WOUND CARE SPECIALIST.

15. DEFENDANTS NP HOOVER AND RN BEEMAN MALICIOUSLY CALLED TO PROVIDE PLAINTIFF WITH A SEATED WALKER/WHEELCHAIR BY WHICH TO ACCESS RECREATION, LIBRARY, MEDICAL APPOINTMENTS, SKYPE VISITS, PROPERTY PASSES AND INSTITUTIONAL ACCESS WHILE PROVIDING WALKERS TO OTHER PRISONERS, caus[ing] PLAINTIFF TO PUSH A CHAIR AROUND FOR BALANCE AND SUPPORT, INJURING PLAINTIFF'S HANDS AND WRISTS.

16. DEFENDANTS NP HOOVER AND BEEMAN SOUGHT TO CONCEAL PLAINTIFF'S CONDITIONS BY IGNORING PLAINTIFF'S REQUESTS AND KNOWN NEED FOR MEDICAL CARE, THEREBY ENDANGERING PLAINTIFF.

17. DEFENDANTS NP HOOVER AND RN BEEMAN DID DELIBERATELY AND MALICIOUSLY INFECT PLAINTIFF WITH PAIN, SUFFERING AND EXPERIMENTAL TORTURE UPON PLAINTIFF BY REFUSING TO TREAT PLAINTIFF AND/OR RETARD

PLAINTIFF TO WESTERN MARYLAND REGIONAL MEDICAL CENTER
(WMRMC) FOR FOLLOW-UP CARE AS DIRECTED BY EXPERTS, FAILING
TO TREAT SEVERE EXACERBATION OF PLAINTIFF'S VASCULAR CONDITION.

18. THE DEFENDANTS DID DELIBERATELY AND MALICIOUSLY INFECT PLAINTIFF WITH PAIN, SUFFERING AND EXPERIMENTAL TORTURE THROUGH MEDICATION DEPRIVATIONS AND MEDICATION MANIPULATION WITHOUT CAUSE OR EVALUATION OF PLAINTIFF.

19. THE DEFENDANTS DID DELIBERATELY AND MALICIOUSLY FAIL TO REVIEW AND PROVIDE PLAINTIFF WITH MEDICATIONS NEEDED TO MANAGE PLAINTIFF'S CHRONIC CONDITIONS, MEDICATIONS PRESCRIBED BY MULTIPLE EXPERIENCED AND QUALIFIED MEDICAL PERSONNEL.

20. THE DEFENDANTS DID DELIBERATELY AND MALICIOUSLY ACT WITH DEPRIVED INDIFFERENCE BY REFUSING TO RESPOND TO PLAINTIFF'S REPEATED REQUESTS AND URGENT PLEAS FOR MEDICAL CARE FOR MONTHS.

21. THE DEFENDANTS DID DELIBERATELY AND MALICIOUSLY INFECT PLAINTIFF WITH PAIN AND SUFFERING, INCLUDING UNKNOWN HEALTH RISKS FROM LACK OF TREATMENT, UPON PLAINTIFF BY FAILING TO RESPOND TO PLAINTIFF'S MANY REQUESTS FOR EXAMINATION OF PAINFUL, DRAWING, BLEEDING LUMPS IN PLAINTIFF'S GENITAL AREA AND THE BACK OF PLAINTIFF'S THIGHES.

22. THE DEFENDANTS DID DELIBERATELY AND MALICIOUSLY ENDANGER PLAINTIFF BY FAILING TO PRESENT PLAINTIFF TO QUALIFIED MEDICAL PERSONNEL, BY NOT HAVING AN ON-SITE PHYSICIAN TO CONDUCT EXAMINATIONS, PROVIDE TREATMENT AND MAKE REFERRALS, ALONG WITH REQUIRING PLAINTIFF TO SEEK MEDICAL CARE FOR PLAINTIFF'S CHRONIC CONDITIONS THROUGH COMMISSARY.

23. THE DEFENDANTS DID DELIBERATELY AND MALICIOUSLY VIOLATE PLAINTIFF'S RIGHTS UNDER THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA) BY FAILING TO MAINTAIN ACCURATE MEDICAL RECORDS OF PLAINTIFF'S MEDICAL CONDITION AND NEED FOR MEDICAL CARE.

24. THE DEFENDANTS DID DELIBERATELY AND MALICIOUSLY PRECLUDE PLAINTIFF FROM SHOWER ACCESS, RECEIVED, LIBRARY ACCESS, MEDICAL APPOINTMENTS, SKYPE VISITS AND INSTITUTIONAL ACCESS BY FAILING TO PROVIDE PLAINTIFF WITH A SEATED WALKER AND/OR WHEELCHAIR FOR SUPPORT TO WALK AND REST AS REQUIRED, DUE TO ADVANCED PERIPHERAL VASCULAR DISEASE (PVD).

25. THE DEFENDANTS DID DELIBERATELY AND MALICIOUSLY ENDANGER PLAINTIFF BY FAILING TO ISSUE A MEDICAL ASSIGNMENT FOR PLAINTIFF TO BE HOUSED PURSUANT TO THE AMERICANS WITH DISABILITIES ACT (ADA), AND THAT PLAINTIFF BE PERMITTED ACCESS TO SEATED SHOWERS WITH RAILINGS AND WHEELCHAIR ACCESS FOR INSTITUTIONAL MOVEMENTS.

26. THE DEFENDANTS DID DELIBERATELY AND MALICIOUSLY ENDANGER PLAINTIFF BY FAILING / REFUSING TO RENEW PLAINTIFF'S MEDICAL ASSIGNMENTS AND BY FAILING TO ADVANCE CONSULTATIONS AND/OR REFERRALS REGARDING PLAINTIFF'S PVD.

27. THE DEFENDANTS DID DELIBERATELY AND MALICIOUSLY ENGAGE IN DISCRIMINATORY, RETALIATORY MEDICINE - PROVIDING MEDICAL CARES TO OTHER PRISONERS WHILE DENYING THE SAME TO PLAINTIFF AFTER PLAINTIFF FILED MULTIPLE COMPLAINTS WITH THE WARDEN'S OFFICE REGARDING THE DEFENDANTS' GROSSLY DEFICIENT MEDICAL PRACTICES AGAINST PLAINTIFF.

28. THE DEFENDANTS DID DELIBERATELY AND MUNICIOUSLY ENDANGER PLAINTIFF BY VIOLATING BOTH THE TERMS OF ITS CONTRACT WITH THE STATE OF MARYLAND AND THE CLINICAL SERVICES AND INMATE HEALTH CHRONIC DISEASE MANAGEMENT MANUAL.

29. IN PLAINTIFF'S PURSUIT OF MEDICAL CARE, THE DEFENDANTS DID DELIBERATELY AND MUNICIOUSLY ABUSE THEIR AUTHORITY IN THE PRACTICE OF MEDICINE BY FOSTERING A HOSTILE, ANTAGONISTIC MEDICAL PROCESS.

30. BY IGNORING PLAINTIFF'S SICK-CALL REQUESTS AND POSTPONING SIGNIFICANT DELAYS IN THE ISSUANCE OF ANY RESPONSE, OFTEN WEEKS TO MONTHS LATER, THE DEFENDANTS SOUGHT TO THwart PLAINTIFF'S EFFORTS TO OBTAIN MEDICAL CARE.

31. INCORPORATING EACH OF THE AFOREMENTIONED ALLEGATIONS, THE DEFENDANTS DID DELIBERATELY AND MUNICIOUSLY FAIL TO REACH THE STANDARD OF CARE FOR PLAINTIFF'S CHRONIC CONDITIONS, THEREBY VIOLATING THE MARYLAND MEDICAL PRACTICE CLAIMS ACT BY DEPRIVING PLAINTIFF PRESCRIBED CARE; BY FAILING TO PROVIDE MEDICAL CARE FOR MONTHS, BY FAILING TO REFER PLAINTIFF TO SPECIALIST(S), BY FAILING TO MAINTAIN ACCURATE MEDICAL RECORDS, BY ENGAGING IN OBSCURE, VINDICTIVE AND NEFARIOUS MEDICINE AND BY THE IMPOSITION OF OPPRESSIVE PAIN AND SUFFERING FOR MONTHS.

V. LEGAL CLAIMS

32. PLAINTIFF REALLEGES AND INCORPORATES BY REFERENCE PARAGRAPHS 1 THROUGH 31.

33. THE DEFENDANTS' DEPRIVED INDIFFERENCE, GROSS NEGLIGENCE, MALPRACTICE AND DELIBERATE INDIFFERENCE TO PLAINTIFF'S MEDICAL NEEDS ENDANGERED PLAINTIFF WHILE INFlicting INJURIES TO WHICH PLAINTIFF HAS BEEN AND CONTINUES TO BE EXPOSED IN VIOLATION OF THE

CONSTITUTION OF MARYLAND, THE MARYLAND HEALTHCARE MALPRACTICE CLAIMS ACT (MHCMCA), AND THE MARYLAND TORT CLAIMS ACT (MTCA).

34. PLAINTIFF HAS MADE EVERY POSSIBLE ATTEMPT TO RESOLVE EVERY ISSUE PRESENTED HEREIN TO NO AVAIL AND HAS NO PLAIN, Ade-
QUATE OR COMPLETE REMEDY AT LAW TO REDRESS THE WRONGS DE-
SCRIBED HEREIN.

VI. PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF RESPECTFULLY PRAYS THAT THIS HONORABLE COURT ENTER JUDGMENT GRANTING PLAINTIFF:

35. A DECLARATION THAT THE ACTS AND OMISSIONS DESCRIBED HEREIN VIOLATE PLAINTIFF'S RIGHTS UNDER THE CONSTITUTION OF MARYLAND, THE MHCMCA AND THE MTCA.

36. COMPENSATORY DAMAGES FOR THE VIOLATIONS DESCRIBED HEREIN.

37. PUNITIVE DAMAGES FOR THE VIOLATIONS DESCRIBED HEREIN.

38. NOMINAL DAMAGES FOR THE VIOLATIONS DESCRIBED HEREIN.

39. A JURY TRIAL ON ALL ISSUES TRIABLE BY JURY.

40. PLAINTIFF'S COSTS IN THIS SUIT.

41. ANY ADDITIONAL RELIEF THIS COURT DEEMS JUST, PROPER AND EQUITABLE.

RESPECTFULLY SUBMITTED,

Wayne Resper
WAYNE RESPER #14319

NASC
14100 MCMULLEN HIGH, S.W.
CUMBERLAND, MD 21502

VERIFICATION

I HAVE READ THE FOREGOING COMPLAINT AND HEREBY VERIFY THAT THE MATTERS ALLEGED THEREIN ARE TRUE, EXCEPT AS TO MATTERS ALLEGED ON INFORMATION AND BELIEF, AND, AS TO THOSE, I BELIEVE THEM TO BE TRUE.

I CERTIFY, UNDER PENALTY OF PERJURY, THAT THE FOREGOING IS TRUE AND CORRECT

EXECUTED AT CUMBERLAND, MARYLAND ON THIS 29TH DAY OF OCTOBER 2021.

Wayne Resper
WAYNE RESPER 274319